

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

VENICE PATTERSON, on behalf of
herself and her minor children A.M. and
B.M.

Case No.
Hon.

Plaintiffs,

Mag. Judge.

v.

RALPH LAUREN RETAIL, INC.,
UNIVERSAL PROTECTION
SERVICE, LLC., D/B/A ALLIED
UNIVERSAL SECURITY SERVICES,

Defendants.

Paul Matouka (P84874)
Alyson Oliver (P55020)
OLIVER BELL GROUP, P.C.
50 w. Big Beaver Road, Suite 200
Troy, Michigan 48084
(248) 327-6556
notifications@oliverlawgroup.com

Attorneys for Plaintiffs

Gary C. Ankers (P421599)
Jessica G. Kingston (P74417)
LITTLER MENDELSON, P.C.
500 Woodward Ave., Suite 2600
Detroit, Michigan 48226
(313) 446-6400
gankers@littler.com
jkingston@littler.com

*Attorneys for Ralph Lauren Retail,
Inc.*

DEFENDANT RALPH LAUREN RETAIL INC.'S NOTICE OF REMOVAL

Defendant Ralph Lauren Retail Inc. (hereinafter referred to as "Ralph Lauren"), by its attorneys, Littler Mendelson PC, give notice that the above action is removed from the Circuit Court for the County of Oakland, State of Michigan, in

which Court said cause is now pending, to the United States District Court for the Eastern District of Michigan.

IN SUPPORT THEREOF, Ralph Lauren states as follows:

1. On or about the 25th day of June, 2024, an action was commenced against Ralph Lauren in the Circuit Court for the County of Oakland, State of Michigan entitled ***Venice Patterson, on behalf of herself and her minor children A.M. and B.M. v. Ralph Lauren Retail, Inc., Universal Protection Service, LLC, D/B/A Allied Universal Security Services*** (hereinafter referred to as “Universal”) Case No. 24-208200-CZ. Plaintiff effectuated service of the Summons and Complaint on Ralph Lauren and Universal on July 9, 2024 and a copy is attached hereto as Exhibit 1.

2. The aforesaid documents constitute all process, pleadings and orders served upon Ralph Lauren in this action.

3. This action is one of which this Court has original jurisdiction under the provisions of Title 28, United States Code, Section 1332 (diversity), and is one which may be removed to this Court by Ralph Lauren pursuant to the provisions of Title 28, United States Code, Section 1441, in that it is an action of civil nature wherein the alleged value of the claim of Plaintiff is in excess of the amount of \$75,000.00, exclusive of interest, costs and attorney fees, and is between citizens of different states, as more fully shown below:

- a. At the time such action was instituted in the Circuit Court for Oakland in the State of Michigan, and at the present time, Plaintiffs are and have been domiciled in the State of Michigan, County of Wayne, as Ralph Lauren is informed and believes (Complaint, ¶1-3).
- b. At the time such action was commenced, and at the present time, Ralph Lauren is a corporation organized under and existing by virtue of the laws of the State of Delaware and is not incorporated in any other state, with its principal place of business in the State of New Jersey (Complaint, ¶4). Ralph Lauren, therefore, is not now, and never has been, a citizen of the State of Michigan. Similarly, at the time such action was commenced, and at the present time, Universal is a corporation organized under and existing by virtue of the laws of the State of Delaware and is not incorporated in any other state, with its principal place of business in the State of Pennsylvania, as Ralph Lauren is informed and believes (Complaint, ¶5). Universal, therefore, is not now, and never has been, a citizen of the State of Michigan.
- c. Plaintiffs have alleged a claim for race and familial discrimination (Complaint, Count II (sic), ¶22-30). Plaintiffs

further allege that, “this incident caused significant humiliation and embarrassment to Ms. Patterson and her children as they were treated like criminals without any justification” (Complaint, ¶19); “this incident caused significant mental and emotional injuries to Ms. Patterson and her children from the profiling, accusations, and subsequent involvement of the police” (Complaint, ¶20). Additionally, Plaintiffs further allege that, “Defendants’ conduct caused Ms. Patterson and her minor children to suffer mental and emotional injuries in addition to humiliation and embarrassment” (Complaint, ¶30).

- d. Based on Plaintiff’s request for damages, Plaintiffs are seeking damages exceeding \$75,000.
- e. For these reasons, the damages from the losses claimed, if proven, exceed \$75,000.00, exclusive of interest, costs and attorney fees, and therefore from a preponderance of the evidence it is more likely than not that the amount in controversy exceeds \$75,000.00, exclusive of interest, costs and attorney fees. *Hayes v. Equitable Energy Res. Co.*, 266 F.3d 560, 572-573 (6th Cir. 2001); *see also Gafford v. General Elec. Co.*, 997

F.2d 150, 155 (6th Cir. 1993), *abrogated in part on other grounds by Hertz Corp. v. Friend*, 559 U.S. 77 (2010).

5. This Notice of Removal is being filed within thirty (30) days of service of said Complaint on Ralph Lauren.

6. Counsel for Ralph Lauren has obtained concurrence from counsel for Universal in removing this matter. Defendant Universal joins and consents to this removal to federal court.

7. Pursuant to 28 U.S.C. § 1446(d), true and correct copies of this Notice of Removal have been served upon Plaintiffs and Ralph Lauren has timely filed a copy of this Notice of Removal with the Clerk of the Oakland County Circuit Court.

WHEREFORE, Ralph Lauren gives notice of removal of this cause from Oakland County Circuit Court to this Court.

Dated: August 6, 2024

/s/ Gary C. Ankers

Gary C. Ankers (P41599)

Jessica G. Kingston (P74417)

LITTLER MENDELSON, P.C.

500 Woodward Ave., Suite 2600

Detroit, Michigan 48243

(313) 446-6400

gankers@littler.com

jkingston@littler.com

Attorneys for Ralph Lauren Retail, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was served upon all parties and/or attorneys of record to the above cause herein at their respective addresses as disclosed on the pleadings on August 6, 2024, via:

<hr/> <input checked="" type="checkbox"/> X	U. S. Mail	<hr/>	Facsimile
	ECF Filing	<hr/>	Hand Delivery
	E-Mail	<hr/>	Federal Express

/s/ Gary C. Ankers

Gary C. Ankers

EXHIBIT 1

Received for Filing Oakland County Clerk

FILED

Approved, SCAO

Original - Court
1st copy - Defendant2nd copy - Plaintiff
3rd copy - Return

STATE OF MICHIGAN JUDICIAL DISTRICT 6th JUDICIAL CIRCUIT COUNTY		SUMMONS CASE NO. 2024-208200-CZ Hon. Martha D. Anderson
Court address 1200 N Telegraph Rd Pontiac, MI 48341-0404		Court telephone no. 248-858-0344
Plaintiff's name, address, and telephone no. Venice Patterson		Defendant's name, address, and telephone no. Ralph Lauren Retail, Inc.
Plaintiff's attorney, bar no., address, and telephone no. Paul Matouka (P84874) 50 W. Big Beaver Rd, Ste 200 Troy, MI 48084		This case has been designated as an eFiling case, for more information please visit www.oakgov.com/efiling .

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.
- It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in this court, _____ Court, where

it was given case number _____ and assigned to Judge _____

The action remains is no longer pending.

Summons section completed by court clerk.

SUMMONS**NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date 6/26/2024	Expiration date* 9/25/2024	Court clerk Lisa Brown
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*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

Summons (3/23)

Case No. 2024-208200-CZ

PROOF OF SERVICE

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE

I served personally by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	Signature	
Incorrect address fee \$	Miles traveled	Fee \$	TOTAL FEE \$	Name (type or print)

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) on Date and time

Signature on behalf of _____

Name (type or print) _____

This case has been designated as an eFiling case, for more information please visit www.oakgov.com/efiling.

**STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND**

VENICE PATTERSON on behalf of herself and her minor children A.M. and B.M.

2024-208200-CZ

Plaintiffs,

v

Case No. 2024-
Hon.

-CZ
JUDGE MARTHA D.
ANDERSON

**RALPH LAUREN RETAIL, INC.,
UNIVERSAL PROTECTION SERVICE,
LLC., D/B/A ALLIED UNIVERSAL
SECURITY SERVICES**

Defendants.

OLIVER BELL GROUP, P.C.

Paul Matouka (P84874)

Alyson Oliver (P55020)

50 W. Big Beaver Rd.

Suite 200

Troy, MI 48084

T: (248) 327-6556

F: (248) 436-3385

E: notifications@oliverlawgroup.com

COMPLAINT AND DEMAND FOR JURY TRIAL

There is no other civil action pending
in this Honorable Court or any
other Court arising out of the
same transaction and occurrence.

NOW COMES Plaintiffs, VENICE PATTERSON and her minor children A.M. and B.M., and in support of her Complaint and demand for jury trial, states as follows:

INTRODUCTION

This is a case arising from alleged violations of the Elliot Larsen Civil Rights Act committed by employees of Ralph Lauren Retail and Allied Universal Security Service.

PARTIES

1. Plaintiff Venice Patterson (Hereinafter "Mrs. Patterson" or "Plaintiff") lives in the City of Detroit, County of Wayne, State of Michigan. During the date and time of the incidents giving rise to this Complaint, Plaintiff was in Oakland County, Michigan.
2. Plaintiff A.M. is Ms. Patterson's daughter who was 16 years old when the events giving rise to this complaint occurred.
3. Plaintiff B.M. is Ms. Patterson's son who was 10 years old when the events giving rise to this complaint occurred.
4. Defendant Ralph Lauren is a foreign for-profit corporation incorporated under the laws of the state of Delaware and headquartered at 100 Metro Boulevard 4th Floor, Nutley, NJ, 07110.
5. Defendant Universal Protection Services LLC., is a foreign limited liability company incorporated under the laws of the state of Delaware with its Corporate Eastern Headquarters located at Eight Tower Bridge, 161 Washington Street, Suite 600 Conshohocken, PA, 19428.

JURISDICTION AND VENUE

6. Jurisdiction and venue are proper in the Oakland County Circuit Court because the transactions giving raise to the allegations in this Complaint occurred in Detroit, Michigan and the amount in controversy exceeds \$25,000.00.
7. The Oakland County Circuit Court has personal jurisdiction over Defendants because they regularly conduct business in Oakland County, and have sufficient minimum contacts with Michigan. Defendants have intentionally availed themselves of this jurisdiction by marketing and selling products and services in this county.

FACTUAL ALLEGATIONS

8. On December 16, 2022, Ms. Patterson and her two children B.M. and A.M, ages 10 and 16 respectively, were shopping at Ralph Lauren store located at the Great Lakes Crossing Outlets, located in Auburn Hills, Oakland County, Michigan.
9. During their time at Ralph Lauren Ms. Patterson and her children were followed around by a security guard employed by Universal Security.
10. During their trip neither Ms. Patterson nor any of her children engaged in any conduct that would give rise to the reasonable inference that they had, or were, attempting to steal anything.
11. As Ms. Patterson approached the cash register to pay, she was approached by multiple security guards who instructed her to leave the store.
12. Ms. Patterson's questions regarding the reason she was being asked to leave went unanswered.
13. At approximately 7:44 p.m. the Auburn Hills Police Department received a call from Brenda Redmond, manager of the Ralph Lauren outlet.
14. Ms. Redmond stated that she observed three women in the store stuffing their jackets with merchandise.
15. When police arrived they searched Ms. Patterson's bag and found no stolen items.
16. The officers reviewed the security footage and informed Ms. Patterson that the video provided no indication that she, or her children, had stolen or attempted to steal anything.
17. The police case report for the incident reads, "cleared no retail fraud happened. (Video confirms no stuffing of items)".

18. The officer who observed the video informed Plaintiff that one of the security guards and Ralph Lauren employees had commented that Plaintiff was picking up too many items and could not afford to purchase them.
 19. This incident caused significant humiliation and embarrassment to Ms. Patterson and her children as they were treated like criminals without any justification.
 20. This incident caused significant mental and emotional injuries to Ms. Patterson and her children from the profiling, accusations, and subsequent involvement of the police.
-

**COUNT II: MCL 37.2101 et seq,
Elliot Larsen Civil Rights Act**

21. Plaintiff realleges and reincorporates the preceding paragraphs as if fully restated herein.
22. Michigan's Elliot-Larsen Civil Rights Acts ("ELCRA") prohibits businesses from engaging in invidious discrimination.
23. Mrs. Patterson and her children are African American.
24. Mrs. Patterson and her children were denied full and equal enjoyment of the services at the Ralph Lauren establishment that customers of another race would have enjoyed.
25. Defendants tracked, hounded, and denied service to Plaintiff and her children on account of their race.
26. Defendants determined that Mrs. Patterson and her children could not afford the items they picked up because of their race.
27. In the alternative Defendants discriminated against Mrs. Patterson and her children based on her familial and/or marital status as she was not present with a "father" for her children.
28. Defendants believed that because Mrs. Patterson was alone with her children, she could not afford the items she picked up.

29. Defendants are in violation ELCRA, MCL 37.2102(a).
30. Defendants' conduct caused Ms. Patterson and her minor children to suffer mental and emotional injuries in addition to humiliation and embarrassment.

REQUEST FOR RELIEF

WHEREFORE, Plaintiff respectfully requests this Court enter judgment against Defendants, requesting joint and several liability for all Defendants and claims, in an amount the trier of fact determines fully and fairly compensates in excess of \$25,000, plus exemplary damages, compensatory damages, punitive damages, interest, costs, and attorney fees, and all other relief available under law.

Respectfully submitted,

Dated: June 25, 2024

/s/Paul Matouka
OLIVER BELL GROUP, P.C.
Paul Matouka (P84874)
Alyson Oliver (P55020)
50 W. Big Beaver Rd.
Suite 200
Troy, MI 48084
T: (248) 327-6556

**STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND**

VENICE PATTERSON on behalf of herself
and her minor children A.M. and B.M.

2024-208200-CZ

Plaintiffs,
v

Case No. 2024-
Hon. JUDGE MARTHA D.
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**RALPH LAUREN RETAIL, INC.,
UNIVERSAL PROTECTION SERVICE,
LLC., D/B/A ALLIED UNIVERSAL
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F: (248) 436-3385
E: notifications@oliverlawgroup.com

JURY DEMAND

Plaintiff seeks a jury trial in this matter.

Respectfully submitted,

Dated: June 25, 2024

/s/Paul Matouka
OLIVER BELL GROUP, P.C.
Paul Matouka (P84874)
Alyson Oliver (P55020)
50 W. Big Beaver Rd.
Suite 200
Troy, MI 48084
T: (248) 327-6556

Oliver Bell Group
50 W BIG BEAVER RD STE 200
TROY MI 48084-5261

\$14.85 US POSTAGE

FIRST-CLASS

Jul 03 2024

Mailed from ZIP 48084

2 OZ FIRST-CLASS MAIL LETTER

RATE

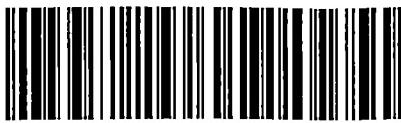
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USPS CERTIFIED MAIL



9436 0118 9876 5460 2562 57

RESTRICTED
DELIVERY

Ralph Lauren Retail, Inc.
c/o Registered Agent
3410 BELLE CHASE WAY STE 600
CSC - LAWYERS INCORPORATING SERVICE
LANSING MI 48911-4274



USPS CERTIFIED MAIL™